

EXHIBIT 173

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Civil Action No. 1:17-cv-02989-AT

DONNA CURLING, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF EMILY MISTY HAMPTON

DATE: November 11, 2022

TIME: 10:49 a.m. to 6:07 p.m.

LOCATION: Courtyard by Marriott Warner Robins
589 Carl Vinson Parkway
Warner Robins, Georgia 31088

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions
1250 Eye Street, N.W., Suite 350
Washington, D.C. 20005

1 MS. LAROSS: Objection as to form.

2 THE WITNESS: That's when they were
3 investigating the recount.

4 BY MR. BROWN:

5 Q And what did they do when they were
6 there in their investigation of the recount other
7 than trying to get the scanner to communicate with
8 the system?

9 MS. LAROSS: Objection as to form.

10 THE WITNESS: That's when we did
11 the -- that's when we hand counted the ballots?

12 BY MR. BROWN:

13 Q Okay. Who actually did the -- the
14 hand counting?

15 A The three investigators from the
16 State.

17 Q Anybody else?

18 A They counted them.

19 Q And that was the final count that you
20 did in Coffee County?

21 A Yes, sir.

22 Q Let me direct your attention to the

1 next page, which is page 19 of Exhibit 3. And do
2 you see the -- I guess, are these photographs here
3 that you texted to Mr. Chaney?

4 A Yes.

5 Q And what do the photographs show?

6 A The poll pads.

7 Q And what are the poll pads showing?

8 A Netflix.

9 Q So you could get Netflix on a poll
10 pad?

11 A That's correct.

12 Q Did you ever tell Russ Ramsland about
13 this feature of the poll pads?

14 A Not that I recall.

15 Q If would turn the page to page 20 of
16 Exhibit 3. What do the photographs at the top of
17 the page of page 20 of Exhibit 3 show?

18 A A computer screen.

19 Q And what's shown on that computer?

20 A Solitaire.

21 Q So the -- is that the ICC scanner
22 computer?

1 A I don't remember the name of it, but
2 it's the one that the scanner was hooked to.

3 Q And it's connected to the internet?

4 MS. LAROSS: Objection as to form.

5 THE WITNESS: I do not know.

6 BY MR. BROWN:

7 Q Well -- okay. So the Solitaire might
8 have been a -- just an application on the -- on
9 that particular computer?

10 A Correct.

11 Q And then if you look at the second
12 photo on page 20 of Exhibit 3, what does that show?

13 A The EMS server computer.

14 Q And what's on the screen there?

15 A That's the Window home screen.

16 Q What is the significance of that to
17 you?

18 MR. MILLER: Object to form.

19 MS. LAROSS: Objection as to form.

20 THE WITNESS: It shows games.

21 BY MR. BROWN:

22 Q And are the games in an app that's on

1 the computer or are those accessed through the
2 internet? Do you know?

3 A An app on the -- I mean the Windows
4 home.

5 Q Right.

6 MR. MILLER: She can answer, but I'm
7 going to object to form.

8 THE WITNESS: It's just the Windows
9 home, like the little icon down there.

10 BY MR. BROWN:

11 Q Okay. Who is Preston Haliburton?

12 A I have no idea.

13 Q Do you see where he -- his name and
14 e-mail address is texted to you by Eric Chaney?

15 A I do.

16 Q And do you know why -- well, what is
17 your understanding of the reason you would be given
18 Preston Haliburton's e-mail address.

19 MR. MILLER: Object to form.

20 THE WITNESS: I do not remember.

21 BY MR. BROWN:

22 Q Tell me about your communications

1 (Hampton Deposition Exhibit Number 10
2 marked for identification.)

3 MS. LAROSS: It looks like Exhibit 10
4 is Tab 22.

5 MR. BROWN: Okay. Fair enough.
6 Exhibit 10 is Tab 22, Exhibit 11 is Tab 6, correct?

7 MS. LAROSS: Correct.

8 MR. BROWN: Thank you.

9 (Hampton Deposition Exhibit Number 11
10 marked for identification.)

11 THE WITNESS: Which one are you
12 asking for?

13 BY MR. BROWN:

14 Q Tab 6.

15 A It's up.

16 Q Ms. Hampton, why did Mike Lindell,
17 also known as My Pillow guy, come to Douglas,
18 Georgia on February 21, 2021?

19 MR. MILLER: Object to form.

20 THE WITNESS: I plead the Fifth on
21 that.

22

1 BY MR. BROWN:

2 Q Did you speak with Mr. Lindell or
3 someone who represented him prior to his visit to
4 Douglas?

5 A I plead the Fifth on that.

6 Q Did you give to Mr. Lindell anything
7 that you had taken from the Coffee County Election
8 Office?

9 A I plead the Fifth on that.

10 Q Who else besides you had keys to
11 the -- well, let me back up a bit.

12 Mr. Lindell's plane, according to Tab
13 6, was in Douglas on the 25th and the 26th. Do you
14 see that?

15 Well, let me just ask you this: Did
16 you know that he was in Douglas on or about the day
17 that you were terminated?

18 A I plead the Fifth.

19 Q Have you ever spoken with any -- with
20 Mr. Lindell or any representatives of Mr. Lindell?

21 A I plead the Fifth.

22 Q Has Mr. Lindell paid you any money?

1 A No, sir.

2 Q Have you received compensation
3 directly or indirectly from Mike Lindell, anyone
4 associated with Mike Lindell?

5 A No, sir.

6 Q Did Mr. Lindell ever come to the
7 Coffee County Election Office, to your knowledge?

8 A Not that I'm aware of.

9 Q Was Mr. Lindell's visit to Douglas
10 related in any way to the work that
11 SullivanStrickler, Mr. Logan or Mr. Lenberg did
12 with respect to Coffee County's election system?

13 MR. MILLER: Object to form.

14 THE WITNESS: I plead the Fifth on
15 that one.

16 BY MR. BROWN:

17 Q Had you -- have you met Mr. Lindell
18 in person?

19 A I plead the Fifth on that.

20 Q Besides you, who else in Coffee
21 County knew that Mr. Lindell was in Douglas in
22 February of 2021?

1 MR. MILLER: Object to form.

2 THE WITNESS: I have no idea.

3 BY MR. BROWN:

4 Q Did he come to meet with Mr. Chaney?

5 And by "he," I mean Mr. Lindell.

6 MR. MILLER: Object to form.

7 THE WITNESS: I have no idea.

8 BY MR. BROWN:

9 Q Had you ever been on Mr. Lindell's
10 airplane?

11 A No, sir.

12 Q Did you meet with a man named Ben
13 Cotton and Stephanie Lambert in Michigan?

14 MR. MILLER: I'm going to object to
15 that being beyond the scope of your need to know on
16 that. Stephanie Lambert is an attorney and
17 anything that she did with Stephanie Lambert would
18 be privileged and she cannot answer those
19 questions.

20 MR. BROWN: Okay. Privilege doesn't
21 extend to everything you do with your attorney, so
22 I'll ask it again.

1 THE WITNESS: I do not know.

2 BY MS. ELSON:

3 Q Okay. Last question for me right
4 now. And I'll just remind you that you're under
5 oath. My question is: Have you produced all of
6 the documents that you have that are responsive to
7 the subpoenas that the Plaintiffs served on you?

8 A To the best of my knowledge, I have.

9 Q Okay. Give me one second.

10 I know I said that was my last
11 question, I have one more to clean up.

12 So you told me that no one had
13 contacted you from the Secretary of State's office,
14 Coffee County's office, State Election Board
15 regarding these visits, or even regarding anything
16 after you were forced to resign, besides the
17 investigator who you discussed the activist,
18 Ms. Pearson with.

19 Did anyone from the Georgia Bureau of
20 Investigations contact you after you were forced to
21 resign?

22 A No, ma'am.

1 CERTIFICATE OF NOTARY PUBLIC

2 I, FELICIA A. NEWLAND, CSR, the officer before whom
3 the foregoing video-recorded deposition was taken,
4 do hereby certify that the witness whose testimony
5 appears in the foregoing deposition was duly sworn
6 by me; that the testimony of said witness was taken
7 by me in stenotype and thereafter reduced to
8 typewriting under my direction; that said deposition
9 is a true record of the testimony given by said
10 witness; that I am neither counsel for, related to,
11 nor employed by any of the parties to the action in
12 which this deposition was taken; and, further, that
13 I am not a relative or employee of any counsel or
14 attorney employed by the parties hereto, nor
15 financially or otherwise interested in the outcome
16 of this action.

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FELICIA A. NEWLAND, CSR
Notary Public

21

22 My commission expires:
September 15, 2024